

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

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FEDERAL TRADE COMMISSION

Plaintiff,

v.

EMPIRE HOLDINGS GROUP LLC,  
d/b/a ECOMMERCE EMPIRE BUILDERS  
and STOREFUNNELS.NET, a limited liability  
company, and PETER PRUSINOWSKI  
Individually and as officer of  
Empire Holdings Group LLC,

Defendants.

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Case No. 2:24-CV-4949

**JOINT MOTION TO EXTEND TEMPORARY RESTRAINING ORDER  
AND CONTINUE THE HEARING TO SHOW CAUSE WHY A PRELIMINARY  
INJUNCTION SHOULD NOT ISSUE**

Plaintiff Federal Trade Commission (“Plaintiff”) and Defendants Empire Holdings Group LLC d/b/a E-Commerce Empire Builders and Storefunnels.net (“EEB”) and Peter Prusinowski (“Prusinowski”) (EEB and Prusinowski, collectively “Defendants”) (Plaintiff and Defendants each, individually, a “Party”, and collectively, the “Parties”), by counsel, jointly move the Court to enter an order: (i) extending the September 20, 2024 Temporary Restraining Order (ECF No. 19) (“TRO”); and (ii) continuing the preliminary injunction hearing currently set for October 7, 2024 to take place no earlier than November 4, 2024.

The FTC filed a Complaint (ECF No. 1) and Emergency Noticed Motion for Temporary Restraining Order (ECF No. 2) in this matter on September 18, 2024. The Court set a hearing on September 20, 2024, during which the Court entered the TRO and set a hearing for Monday, October 7, 2024 to show cause why a preliminary injunction should not issue. (ECF No. 19).

The Parties jointly request a four-week continuance of the show cause hearing because Defendants require more time to prepare; Plaintiff and Defendants' counsel have recently begun settlement discussions and would use a four-week extension to continue these discussions such that the relief requested may help the Parties to conserve their respective resources and minimize any burden on the Court's resources.

The Parties have agreed that, absent other order of the Court, the TRO entered September 20, 2024 would remain in effect. The Parties have also agreed that the relief requested herein is without prejudice to any Party's rights, including Defendants' Motions to Dismiss (ECF No. 23) and Motion to Amend the TRO (ECF No. 24), as well as any motion to modify the asset freeze to allow release of discrete funds for Mr. Prusinowski's family expenses and attorneys' fees. Further, if the Court wishes to rule on Defendants' Motion to Amend the TRO (ECF No. 24) before the preliminary injunction hearing, the Parties jointly request oral argument.

WHEREFORE, Plaintiff and Defendants jointly request that the Court enter an order: (i) extending the TRO; and (ii) continuing the preliminary injunction hearing currently set for October 7, 2024 to take place no earlier than November 4, 2024.

[SIGNATURES ON NEXT PAGE]

Date: October 3, 2024

Respectfully submitted,

/s/ Amanda Grier

Amanda Grier (DC Bar No. 978573)  
Ryan McAuliffe (MD Bar No. 2012170072)  
Federal Trade Commission  
600 Pennsylvania Avenue, NW, CC-8543  
Washington, DC 20580  
Tel. (202) 326-3745  
Fax: (202) 326-3044  
[agrier@ftc.gov](mailto:agrier@ftc.gov)  
[rmcauliffe@ftc.gov](mailto:rmcauliffe@ftc.gov)

*Attorneys for Plaintiff  
Federal Trade Commission*

/s/ Ryan M. Poteet

Clair E. Wischusen (Bar No. 306752)  
Ryan M. Poteet (*pro hac vice*)  
Stephan Freeland (*pro hac vice*)  
GORDON REES SCULLY MANSUKHANI, LLP  
277 S. Washington Street, Suite 550  
Alexandria, Virginia 22314  
Tel. (202) 399-1009  
Fax. (202) 800-2999  
[cwischusen@grsm.com](mailto:cwischusen@grsm.com)  
[rpoteet@grsm.com](mailto:rpoteet@grsm.com)  
[sfreeland@grsm.com](mailto:sfreeland@grsm.com)

*Counsel for Defendants  
Empire Holdings Group LLC and  
Peter Prusinowski*

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on this 3rd day of October 2024 the foregoing Joint Motion to Extend Temporary Restraining Order and Continue Preliminary Injunction Hearing and proposed Order granting same was electronically filed via the Court's ECF system pursuant to the agreement of the Parties, and was thereby served upon all counsel of record.

By: /s/ Ryan M. Poteet  
Ryan M. Poteet